## Case 13-21662 Filed 03/08/13 Doc 15

1	BERT M. VEGA, ESQ. State Bar No. 173141		
2	506 Sacramento Street Vallejo, California 94590		
3	Tel: (707) 558-9375 Fax (707) 558-9505		
4	Attorney for Debtors		
5	WARLÍTO DACQUEL DAGDAGAN and DOMITILLA ORDONEZ DAGDAGAN		
6	UNITED STATES BANKRUPTCY COURT		
7	EASTERN DISTRICT OF CALIFORNIA		
8	SACRAMENTO DIVISION		
10	IN RE:	) Bankruptcy Case No. 13-21662-D-7	
10	IIV KE.	) Chapter 7	
12	WARLITO DACQUEL DAGDAGAN AND	) DC No. BMV-01	
13	DOMITILLA ORDONEZ DAGDAGAN,	DECLARATION OF DEBTORS'	
14		ATTORNEY, BERT M. VEGA, IN SUPPORT OF MOTION TO COMPEL	
15	Debtors.	TRUSTEE TO ABANDON DEBTORS BUSINESS	
16	DECLARATION		
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19	Dagdagan in a Chapter 7 Bankruptcy filed on February 7, 2013. Their 341 Meeting is scheduled		
20	to be held on March 13, 2013 at 3:00 pm at 501 "I" Street, Room 7B, Sacramento, CA. The		
21	matter set forth in this, my declaration, are true of my own knowledge, and if called upon to do		
22	so, I could and would competently testify to them.		
23	2. Both Debtors are retired but the Joint Debtor operates a small childcare business		
<ul><li>24</li><li>25</li></ul>	which has been declared in their Statement of Financial Affairs.		
26	3. On March 2, 2013, the Trustee brought to my attention that Joint Debtor is prohibited		
27	from operating a business in a Chapter 7 bankruptcy without a court order and advised me to		
28	inform Joint Debtor to cease operating her co	hildcare business immediately.	
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1	4. Debtors argue that the value of the childcare business is of inconsequential or of little	
2	value and benefit to the estate. However, the operation of the business is necessary for the	
3	livelihood of the debtors to enable them to continue to pay for their daily living expenses.	
4	5. Debtors and Petitioners respectfully request for an Order Compelling the Trustee to	
5	Abandon the Business in favor of the Debtors because it is of inconsequential value and benefit	
6	to the estate under 11 USC § 554 (b) but of great value to the Debtors livelihood.	
7	I declare under penalty of perjury under the laws of the state of California that the	
8	foregoing is true and correct.	
9	Dated: March 8, 2013	
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12	/s/ Bert M. Vega BERT M. VEGA, Esq.	
13	Attorney for Debtors	
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